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*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC,

Plaintiff,

v.

UKFP (ASIA) NOMINEES LIMITED f/k/a
TOWRY LAW (ASIA) NOMINEES
LIMITED,

Defendant.

Adv. Pro. No. 12-01566 (CGM)

**STIPULATION AND ORDER DISMISSING WITH PREJUDICE
CERTAIN TRANSFERS ALLEGED IN THE COMPLAINT**

Plaintiff Irving H. Picard (the “Trustee”), as trustee of the substantively consolidated liquidation proceeding of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the chapter 7 estate of Bernard L. Madoff, individually, and defendant UKFP (Asia) Nominees Limited f/k/a Towry Law (Asia) Nominees Limited (“Defendant”), by and through their respective, undersigned counsel, stipulate and state as follows (“Stipulation”):

WHEREAS, on April 26, 2012, the Trustee filed his Complaint (“Complaint”) against Defendant [ECF No. 1], and after conferring with Defendants, the Trustee has agreed not to pursue several of the alleged transfers identified as part of Count One of the Amended Complaint.

IT IS HEREBY STIPULATED AND AGREED, by and between the parties, and **SO ORDERED**, by the Court:

1. Pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, as incorporated by Rule 7015 of the Federal Rules of Bankruptcy Procedure, the Trustee amends his Complaint to dismiss with prejudice Count One of the Complaint solely as to seven separate Fairfield Sentry Subsequent Transfers (as defined in the Complaint) identified on Exhibit C to the Complaint in the total amount of \$2,829,858. Specifically, the dismissed Subsequent Transfers are as follows:

SUBSEQUENT TRANSFERS FROM FAIRFIELD SENTRY TO UKFP

DATE	AMOUNT
3/14/2003	(1,274,020)
3/14/2003	(1,263,414)
3/14/2003	(119,323)
3/14/2003	(24,956)
4/14/2003	(58,314)
4/14/2003	(46,374)
4/14/2003	(43,457)

2. Except as expressly set forth in Paragraph 1, this Stipulation has no effect on Count One of the Complaint as to any other alleged Subsequent Transfers identified in the Complaint.

3. This Stipulation is without prejudice to (1) the Trustee's right to seek leave to amend the Complaint pursuant to Fed. R. Civ. P. 15(a)(2) to assert claims to avoid and/or recover any additional or other transfers to the Defendant, as may be determined through the Trustee's continuing investigation and through discovery, and (2) the Defendant's or any proposed additional defendants' rights to oppose any such amendment(s) and/or defend against such claim(s).

4. Nothing in this Stipulation shall limit, restrict, or impair any defense, right, or argument that has been raised or could be raised by Defendant in a motion to dismiss under Fed. R. Civ. P. 12 or Fed. R. Bankr. P. 7012 (including, without limitation, all defenses based on lack of personal jurisdiction or insufficient service of process), or any defense, right, or argument that could be raised by the Trustee in response thereto.

[Signatures and order appear on the next page]

Dated: New York, New York
March 11, 2022

BAKER & HOSTETLER LLP

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*Attorneys for Defendant UKFP (Asia)
Nominees Limited*

SO ORDERED.

Dated: March 15, 2022
Poughkeepsie, New York



/s/ Cecelia G. Morris

Hon. Cecelia G. Morris
U.S. Bankruptcy Judge